

Before the
COPYRIGHT ROYALTY TRIBUNAL
1825 Connecticut Avenue, N.W.
Suite 918
Washington, D.C. 20009

IN THE MATTER OF:)	
)	CRT DOCKET 91-5-90SCD
1990 SATELLITE CARRIER)	
DISTRIBUTION PROCEEDING)	

**COMMENTS OF ITM, INC., CORAL RIDGE MINISTRIES
MEDIA OUTREACH DIVISION, AND ORAL ROBERTS
EVANGELISTIC ASSOCIATION ON EXISTENCE OF CONTROVERSY
AND NOTICE OF INTENT TO PARTICIPATE**

ITM, Inc. d/b/a In Touch Ministries ("ITM"), Coral Ridge Ministries Media Outreach Division ("CRM") and Oral Roberts Evangelistic Association ("OREA"), respectfully submit this reply to the Tribunal's Notice, published 56 Fed. Reg. 37, 530 (August 7, 1991), seeking comments on the existence of a controversy concerning the 1990 Satellite Carrier Fund. Counsel for the above-stated Claimants requests leave to file these comments on the grounds that it did not receive notice of this comment request, and until today it was not aware of the Notice, and that the short delay in providing these comments does not prejudice any of the other Claimants.

Comments On The Existence of a Controversy.

Although ITM, CRM and OREA intend to work with all other current Claimants to reach settlement of any Phase I and Phase II disputes for the 1990 Fund, no such settlement has occurred. Therefore, a Phase I and Phase II controversy does exist for 1990. ITM, CRM and OREA did not submit claims to the 1989 Fund, and make no comment about any controversy in that regard.

Notice of Intent to Participate.

ITM, CRM and OREA also notify the Tribunal that they intend to participate in the 1990 Satellite Carrier Royalty Distribution proceeding.

Comments On Consolidation of 1989 and 1990 Proceedings.

ITM, CRM and OREA respectfully submit that the 1989 and 1990 proceedings should not be consolidated, since they have made no claims for the 1989 Fund and therefore would be unduly burdened by having to prepare and examine data and evidence for the 1989 proceeding which may be unrelated to their 1990 claims.

Respectfully submitted,

ITM, INC. d/b/a IN TOUCH MINISTRIES,
CORAL RIDGE MINISTRIES MEDIA OUTREACH
DIVISION, AND ORAL ROBERTS
EVANGELISTIC ASSOCIATION

By 

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September 11, 1991

[rmc/C1990.CRT]

CERTIFICATE OF SERVICE

I, Richard M. Campanelli, do hereby certify that I have this 11th day of September 1991, mailed by First Class U.S. Mail, postage-prepaid, the foregoing COMMENTS ON EXISTENCE OF CONTROVERSY AND NOTICE OF INTENT TO PARTICIPATE to the following:

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